UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,))
V.) Court No. 04-CV-12572-RWZ
MARYANNE THOMAS-SAADE,)
Defendant.	

UNITED STATES' MOTION FOR DEFAULT

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, the plaintiff, United States of America, moves this Court to enter a default against the defendant, Maryanne Thomas-Saade (hereinafter "Thomas-Saade"), for failing to plead to, or otherwise defend, the complaint for the above captioned action.

In support, the United States says:

- 1. According to our office records, Thomas-Saade is indebted to the United States for the principal amount of \$168,939.37; plus \$5,472.32 accrued interest at the rate of 4.625 percent; plus costs. The total balance as of March 29, 2005 is \$174,411.69.
- 2. The submitted affidavit of Nancy M. Rojas, Paralegal for the United States

 Attorney's Office Financial Litigation Unit, Boston, Massachusetts, establishes Thomas-Saade's failure to plead to the complaint.

WHEREFORE, the United States moves this Court to enter a default, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, against Thomas-Saade for failing to plead to, or otherwise defend, the complaint in the above captioned action.

Respectfully submitted,

UNITED STATES OF AMERICA By its attorneys

MICHAEL J. SULLIVAN United States Attorney

By:

/s/ Christopher R. Donato
CHRISTOPHER R. DONATO
Assistant U.S. Attorney
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3288

Dated: March 31, 2005

CERTIFICATE OF SERVICE

Suffolk, s.s. Boston, MA

I hereby certify that on this day, I served a copy of the foregoing by mailing to Maryanne Thomas-Saade located at 17 Central Square, West Bridgewater, MA 02379.

/s/ Christopher R. Donato CHRISTOPHER R. DONATO Assistant U.S. Attorney

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff,)	
v.)	Civil Action No. 04-CV-12572-RWZ
MARYANNE THOMAS-SAADE,)	
Defendant.)	

AFFIDAVIT SUPPORTING UNITED STATES' MOTION FOR DEFAULT

- I, Nancy M. Rojas, state under oath that:
- 1. I am a Paralegal with the United States Attorney's Office Financial Litigation Unit located in Boston, Massachusetts.
- In that capacity, I process and maintain debt collection cases, including the case of 2. Maryanne Thomas-Saade (hereinafter "Thomas-Saade"). I am also the custodian of the records for such cases.
- Thomas-Saade was served, according to the return of service, with a summons 3. and complaint on February 7, 2005 at 17 Central Square, West Bridgewater, MA 02379. See attached Exhibit "A". As of March 29, 2005, Thomas-Saade has not served on the United States Attorney an answer, or other responsive pleading, to the complaint in the above captioned action.

Date: March 30, 2005

Signed and sworn to before me at Boston, Massachusetts, on this 30 days

Notary P

My commission expires:

U.S. Department of Justice United States Marshals Service

PROCESS RECEIPT AND RETURN

See Instructions for "Service of Process by the U.S. Marshal" on the reverse of this form.

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